

IN THE UNITED STATES BANKRUPTCY COURT  
OF THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CASE NO. 1:23-bk-00737 HWV  
LANE ALLEN MAYS, II :  
Debtor : CHAPTER 13

SECOND MOTION FOR EXTENSION OF TIME TO FILE  
SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF  
CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST,  
PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN

AND NOW comes Debtor, Lane Allen Mays, II, by and through his attorney, Gary J.

Imblum, and respectfully represents:

1. Debtor filed a Chapter 13 Bankruptcy to the above term and number on April 2, 2023.
2. Debtor filed the bankruptcy as an emergency due to a pending utility shut off scheduled for April 3, 2023 and a sheriff sale of his residence scheduled for April 11, 2023.
3. Debtor's counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing. More specifically, Debtor is in the process of filing unfiled tax returns so that we can account for the tax liability/tax refunds on the Schedules.
4. A Motion for Extension of Time was filed on April 17, 2023 which was approved by an Order dated April 20, 2023.

5. Debtor's schedules are due to the Court on or before May 17, 2023.
  
6. It is estimated that Debtor's counsel will need an additional 30 days in order to file the bankruptcy schedules and plan.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order extending the deadline for Debtor to file bankruptcy schedules and plan until June 17, 2023.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



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Attorney for Debtor

Dated: May 15, 2023

**CERTIFICATE OF SERVICE**

**I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing SECOND MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS, AND CHAPTER 13 PLAN on the following person(s) by E-Service, addressed to:**

**JACK ZAHAROPOULOS ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE**

**IMBLUM LAW OFFICES, P.C.**

*Bernadette Davis*  
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717 238-5250  
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**Dated: May 15, 2023**

**IN THE UNITED STATES BANKRUPTCY COURT  
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CASE NO. 1:23-bk-00737 HWV**  
**LANE ALLEN MAYS, II** :  
**Debtor** : **CHAPTER 13**

**ORDER**

**Upon consideration of Debtor's Second Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,**

**IT IS HEREBY ORDERED AND DECREED that the deadline for filing the aforementioned pleadings in the above captioned case is extended through June 17, 2023.**